

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

v.

MAJED TALAT HAJBEH

Defendant.

:
:
:
:
:
:
:
:

CASE NO. 1:21-CR-83-TSE

**MOTION TO SUPPRESS FISA SEARCH, AND FOR DISCLOSURE OF FISA
MATERIALS TO DEFENSE COUNSEL**

COMES NOW the Defendant, Majed Talat Hajbeh, by counsel, and moves the Court to suppress all evidence obtained as a result of the search of Mr. Hajbeh's Google Drive account, or any other searches, conducted pursuant to the Foreign Intelligence Surveillance Act ("FISA"), and to compel the disclosure of all FISA materials to defense counsel, for the reasons provided in the enclosed Memorandum.

Respectfully Submitted,
Majed Talat Hajbeh
By Counsel

ELSAYED LAW PLLC

BY: ____/s/____

Muhammad Elsayed
Virginia Bar No. 86151
1934 Old Gallows Road
Suite 350
Vienna, Virginia 22182
(703) 884-2636
(703) 884-2637 (fax)
me@elsayedlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was filed electronically using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

_____/s/_____
Muhammad Elsayed
Virginia Bar No. 86151
Elsayed Law PLLC
1934 Old Gallows Road
Suite 350
Vienna, Virginia 22182
(703) 884-2636
(703) 884-2637 (fax)
me@elsayedlaw.com